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*Attorneys for Defendants
Shein Distribution Corporation,
Roadget Business Pte. Ltd.,
Zoetop Business Company, Limited,
and George Chiao*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

KRISTA PERRY, an individual;
LARISSA MARTINEZ, an
individual; JAY BARON, an
individual; RACHEL PFEFFER, an
individual; DIRT BIKE KIDZ, Inc.,
a California corporation;
ESTELLEJOYLYNN, LLC, a New
Jersey limited liability company;
JESSICA LOUISE THOMPSON
SMITH, an individual; LIV LEE, an
individual,

Plaintiffs,

v.

SHEIN DISTRIBUTION
CORPORATION, a Delaware
corporation; ROADGET BUSINESS
PTE., LTD; ZOETOP BUSINESS
CO., LTD.; and GEORGE CHIAO.

Defendants.

Case No. 2:23-cv-05551-MCS-JPR

Assigned to: Hon. Mark C. Scarsi

JOINT NOTICE OF SETTLEMENT

1 TO THE COURT: PLEASE TAKE NOTICE that Plaintiffs Krista Perry,
2 Larissa Martinez, Jay Baron, Rachel Pfeffer, Dirt Bike Kidz, Inc., Estellejoylynn,
3 LLC, Jessica Louise Thompson Smith, and Liv Lee (collectively, "Plaintiffs"), and
4 Defendants Shein Distribution Corporation, Roadget Business Pte., Ltd., Zoetop
5 Business Company, Limited, and George Chiao (collectively, "Defendants")
6 (together, the "Parties") have, at the conclusion of a mediation on September 5, 2025,
7 agreed to the terms of a binding short form settlement agreement (the "Short Form
8 Terms of Settlement"), reached a settlement in full of the above-referenced case. As
9 contemplated by the Short Form Terms of Settlement, a more formal settlement
10 agreement is being circulated between the parties for review and approval. The
11 parties anticipate that within thirty days, the settlement will be documented and
12 completed, and a dismissal of the entire action will be filed.

13 The Parties therefore jointly request that the Court vacate the trial date and all
14 pretrial dates and deadlines as well as all pending hearing dates.

15 DATED: September 8, 2025

PAUL HASTINGS LLP

17 By: /s/ Steven A. Marenberg
Steven A. Marenberg

18 *Attorneys for Defendants*

20 DATED: September 8, 2025

WOOLLS PEER DOLLINGER & SCHER

22 By: /s/ Antoinette Waller
Antoinette Waller

24 *Attorneys for Plaintiffs*

25 **ATTESTATION**

26 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filing party hereby attests that all
27 signatories listed concur in this filing's content and have authorized this filing.
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